

Reply Comments of Access Humboldt

7 August 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

Access Humboldt submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Access Humboldt is a non-profit, community based, public service media organization serving the residents of Humboldt County. ([read more](#)). We provide air time free of charge on the local cable TV channels and online, and offer media production training, facilities and equipment. We promote free speech and community media - by the people; for the people.

We are committed to accessibility for all members of our community and present programs that include closed captioning for deaf and hearing impaired viewers. The onscreen video programming guide of our multichannel video programming distributor (MVPD), Suddenlink Communications, does not provide a label or symbol indicating that these programs have closed captions.

As part of our ongoing efforts to support “local voices through community media” we gather and share meta-data including title, duration and other pertinent information about local non-commercial programs that we air on cable access channels and otherwise distribute. However, the program guide listings of our cable operator are inadequate to inform local viewers of local programs. In our view, the program listing guide information at present is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD’s video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information to include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description). This is particularly important for local programs serving local community needs and interests.

Thank you for the opportunity to submit these comments.

Sean McLaughlin

Executive Director

Access Humboldt

P.O. Box 157

Eureka, CA 95502

(707) 476-1798

e: sean@accesshumboldt.net